#### **Baker & Hostetler LLP**

45 Rockefeller Plaza New York, NY 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan Nicholas J. Cremona

Dean D. Hunt

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CEH LIMITED PARTNERSHIP; EVELYN M. CHERNIS, in her capacity as a General Partner of CEH Limited Partnership and as Trustee of the Evelyn M. Chernis Revocable Trust DTD 3/23/87 and the Herbert J. Chernis Trust DTD 3/23/87; HERBERT J. CHERNIS, in his capacity as a General Partner of CEH Limited Partnership and as Trustee of the Evelyn

Adv. Pro. No. 08-01789 (SMB)

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04358 (SMB)

M. Chernis Revocable Trust DTD 3/23/87 and the Herbert J. Chernis Revocable Trust DTD 3/23/87; EVELYN M. CHERNIS REVOCABLE TRUSTS DTD 3/23/87, in its capacity as a Limited Partner of CEH Limited Partnership; and HERBERT J. CHERNIS REVOCABLE TRUST DTD 3/23/87, in its capacity as a Limited Partner of CEH Limited Partnership,

Defendants.

### SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures have been exchanged.
- 2. Fact Discovery shall be completed by: February 2, 2015.
- 3. The Disclosure of Case-in-Chief Experts shall be due: May 8, 2015.
- 4. The Disclosure of Rebuttal Experts shall be due: June 8, 2015.
- 5. The Deadline for Completion of Expert Discovery shall be: September 4, 2015.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before November 4, 2015.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before November 18, 2015.
- 8. The Deadline for Conclusion of Mediation shall be: On or before March 17, 2016.

Dated: New York, New York November 12, 2014

Of Counsel:

## **BAKER & HOSTETLER LLP**

811 Main, Suite 1100 Houston, Texas 77002 Telephone: 713.751.1600 Facsimile: 713.751.1717

Dean D. Hunt

#### **BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona
David J. Sheehan
Nicholas J. Cremona
45 Rockefeller Plaza
New York, NY 10111
Talanhana: 212,580,4200

Telephone: 212.589.4200 Facsimile: 212.589.4201

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff